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NOV 25 2019

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

U.S. District Court
Middle District of TN

(UNDER SEAL),

Case No:

COMPLAINT

Plaintiff

vs.

(UNDER SEAL).

Defendants

FILED IN CAMERA AND
UNDER SEAL
**PURSUANT TO 31 USC
s3730 (b) (2)**

**DOCUMENT TO BE KEPT UNDER SEAL
(DO NOT PLACE ON PACER)**

Corey Donaldson
PRO SE- Relator
Imnowunleashed@gmail.com
14 Oak Ave
Longwarry
Victoria, Australia 3816.
Phone: By arrangement via email.

COMPLAINT

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

(UNDER SEAL),

Case No:

**EX PARTE MOTION TO
FILE COMPLAINT
UNDER SEAL
PURSUANT TO 31 USC
§3730 (b) (2)**

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IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

UNITED STATES OF AMERICA, ex rel-
Corey Donaldson,

Case No:

**COMPLAINT FOR
VIOLATION OF
FEDERAL FALSE
CLAIMS ACT & 18 USC
4 MISPRISION OF
FELONY EMERGENCY
REPORT**

**FILED IN CAMERA AND
UNDER SEAL
PURSUANT TO 31 USC
s3730 (b) (2)**

Plaintiff

vs.

Core Civic (NYSE: CXW)

& Core Civic Employees - Stacey Stone, Shawn Gillis, Terrence Dickerson,
Jody Yancy, Christopher Chestnut, Damon Hininger, William Dalius, Timothy
Wheaton,

**JURY TRIAL
DEMANMDED**

Defendants.

I, Plaintiff-Relator Corey Donaldson, under the authority of 31 USC § 3730 (b) (1)

“A person may bring a civil action for a violation of section 3729 for the person and for the

United States Government”, do, on behalf of THE UNITED STATES OF AMERICA (the “Government” or the “Federal Government”), **AND** under 18 USC 4 Misprision of felony, “*Whoever, having knowledge of the actual commission of a felony cognizable by a court of the United States, conceals and does not as soon as possible make known the same to some judge or other person in civil or military authority under the United States, shall be fined under this title or imprisoned not more than three years, or both*”, file this Complaint against defendant Core Civic et al, (“Defendant(s)”) alleging based upon personal knowledge, relevant documents, and information and belief, as follows:

INTRODUCTION

1. This is an action to recover damages, civil and criminal penalties on behalf of The United States arising from false and/or misleading fraudulent records, statements, conduct, claims made and caused to be made by the Defendant(s), and/or its agents and employees, in violation of the federal False Claims Act, 31 USC 3729 et seq. (The FCA”), and numerous criminal violations as cited on this Relator’s attached affidavit, including but not limited to organised violations of:
 - a. The Prison Rape Elimination Act 2003
 - b. 18 U.S. Code § 1341 Frauds and Swindles - Mail Fraud.
 - c. 18 U.S. Code § 1519 Destruction, alteration, or falsification of records in Federal investigations and bankruptcy.
 - d. 18 U.S. Code § 1520 Destruction of corporate audit records.
 - e. 18 USC 1001 & 1519 ‘falsify, conceal, or cover up by any trick, scheme, or device a material fact’.

2. This action seeks to recover millions of federal dollars spent with Core Civic, who provide low security correctional services to federal Immigrant Inmates and Detainees throughout the United States.
3. The federal government spends many hundreds of millions of dollars each year with Core Civic with the understanding and promise that Core Civic obeys the laws of The United States, and is mandated to do so by contract.
4. This action alleges that:
 - a. Private prison contractor Core Civic have a Bureau of Prisons (BOP) contract condition for healthcare accreditation with The Joint Commission. I have uncovered evidence showing:
 1. Core Civic have promised the OIG/BOP/SEC accreditation compliance in official government reports, and have not delivered, while being unjustly enriched by the contract.
 2. Non-public admissions from inside The Joint Commission that NONE of Core Civic facilities are so accredited, placing Immigrant Inmates/Detainees at a health risk.
 3. Non-public evidence that THE JOINT COMMISSION forced Core Civic to withdraw fraudulent accreditation representations on their website, and they have complied, but not sought accreditation.
 4. I have evidence of the BOP contract requirements relating to The Joint Commission.

There are 6 exhibits. (*See Affidavit and exhibits for the details and evidence*)

A witness from The Joint Commission is named.

EMERGENCY: The evidence is that Core Civic is engaging healthcare fraud and the evidence is that Immigrants are dying in their facilities. The connection is inescapable,

making this healthcare fraud an emergency life and death issue. For example:

<https://theintercept.com/2019/08/29/ice-solitary-mental-health-corecivic/>

This healthcare fraud has also given freeway for “industrial level” sex crimes to be carried out on Immigrants involving the cover-up participation of healthcare workers at Core Civic, as is shown below.

- b. I possess “original” and non-public documents proving that Core Civic:
 1. Twice-falsified Prison Rape Elimination Act (PREA) reports to the Federal Government with omissions and concealment, in order to mislead the BOP/SEC/OIG/ICE/Shareholders/Investors and ensure unjust enrichment, benefit and/or employment. This fraud is revealed when contrasting original non-public documents with the Defendants public reports to the government.
 2. “Industrial scale” staff sex crimes only upon Immigrants at Core Civics’ McRae Correctional Institution in Georgia, with approval and/or non-intervention from head office in Nashville.
 3. Retaliation for reporting staff sex crimes.
 4. Organised mishandling of staff sex crime grievances.
 5. The conscious violation of contract compliance obligations related to the PRISON RAPE ELIMINATION ACT of 2003 (PREA), in order to mislead the BOP/SEC/OIG/ICE/Shareholders/Investors and ensure unjust enrichment, benefit and/or employment.

There are 26 exhibits.

Core Civic staff witnesses are named. Immigrant Inmate/Detainee witnesses are available.

(See Affidavit and exhibits for the details and evidence)

- 5 In order to ensure funding, Core Civic suppresses Immigrants by force when reporting staff sex crimes, calculates to mishandle staff sex crimes grievances, knowingly falsifies documents submitted to the federal government regarding staff sex crimes, and/or lied, representing that it is compliant with statutorily mandated aspects of the contract, when it is comprehensively not compliant, on purpose, and fraudulently represents that is contract compliant with accreditation by The Joint Commission.
- 6 Evidence and exhibits within the attached affidavit will show that, from the top down, there is a mandate within Core Civic to intentionally misrepresent their healthcare provisions, to sexually harass Immigrants, to respond to Immigrant grievances of staff sexual harassment with the brute force of a thug gang, organised crime and disciplined sociopathy, to penalise the absence of stoicism, and to report falsely to the government about facts that betray their policies.

All this is the exact opposite to what Core Civic tells the BOP/SEC/OIG/ICE/Shareholders/Investors about what it is they do, as it makes a mockery of The United States in multiple expressions of God-Complex-Justified outright anarchy.
- 7 These false claims are “material” because the false claims in question will result in the government either stop paying for Core Civics’ services and/or make them correct the fraud.

PARTIES

1. This Relator, Corey Donaldson, an Australian National, is a deported former Immigrant Inmate/Detainee incarcerated by Core Civic in 2017-2018, who was under contract with the Bureau of Prisons (BOP). *See Affidavit for the details and evidence.*

Core Civic counts on Immigrants it executes healthcare and sex crimes upon, with knowledge of ‘*how the sausage is made*’ at Core Civic, to be deported into silence, be without ‘standing’, and out of reach of the courts for redress. Such has been accomplished for this Relator, and countless thousands of others. Therefore, only The United States may achieve redress for offences against her laws, and her laws allow a deported Immigrant, as ‘a person’, to initiate such redress on behalf of The United States.

Only a deported Immigrant, subjected to the stated crimes, could testify to all these matters. I am one of those so deported and I was so targeted, and an eye-witness to all these events.

I am the “original source” for the story in *The Guardian* relating to Core Civic staff sex crimes, nullifying the public disclosure bar. See:

<https://www.theguardian.com/us-news/2019/may/29/private-prison-staff-voyeurism-corecivic-georgia>

2. Core Civic is a diversified, government-contracted company providing correction/detention services for more than 30 years, and is a publicly-traded real estate investment trust (REIT), on the New York Stock Exchange (NYSE: CXW). Core Civic head office is located at 5501 Virginia Way, Suite 110 Brentwood TN 37027. The individuals named as defendants are Core Civic staff.

Defendants Damon Hininger and William Dalius work at the above address. Defendants Stacey Stone, Shawn Gillis, Terrence Dickerson, Jody Yancy & Christopher Chestnut & Timothy Wheaton last known work location was 112 Jim Hammock Drive, McRae, GA 31055.

JURISDICTION AND VENUE

1. This court has jurisdiction over the subject matter of this action pursuant to 28 USC 1331, 1332, 1339, 1343, 1345 and 31 USC 3732. The latter of which specifically conferred jurisdiction on this court for actions brought pursuant to 31 USC 3729 and 3730.
2. This Court has jurisdiction over the subject matter of this action pursuant to 18 USC 3231, as it relates to numerous criminal offences against The United States by the Defendants.
3. This Court has personal jurisdiction over the Defendant(s) pursuant to 31 USC 3732(a) because that section authorizes the nationwide service of process. The Defendants are largely located in Nashville Tennessee and in Georgia.
4. Venue of proper in The Middle District of Tennessee pursuant to 28 USC 1391(b)-(c) and 31 USC 3732(a) because the Defendant(s) can be found in and/or transacts or has transacted business in this district, and because violations of 31 USC 3729 et seq. alleged herein occurred partly within this district, and by oversight within this district. At all times relevant to this Complaint, the Defendant(s) regularly conducted substantial business within this district and/or made significant sales within this district.
5. The are no filing requirements to be met when submitting an 18 USC 4 Misprision of felony report, which comprises part of this Complaint. However, jurisdiction and

venue are appropriate in this Federal Court as the criminal violations attested to are federal, and had ultimate oversight within this district.

THE AFFIDAVIT – DISCLOSURE STATEMENT

The criminal and fraudulent conduct of the Defendant(s) at issue in this Complaint are sworn to under 28 USC 1746 to by this Relator and are disclosed in the attached affidavit with exhibits, in five categories:

1. FALSE CLAIM ONE:

To ensure continued funding, Core Civic calculates not to disclose noncompliance with:

- THE PRISON RAPE ELIMINATION ACT OF 2003
- BOP PROGRAM STATEMENTS
- THE BOP/ICE CONTRACT
- CORE CIVIC’S OWN POLICIES
- UNITED STATES CRIMINAL STATUTES RE: THE DOJ & IRS

2. FALSE CLAIM TWO:

CORE CIVIC PROMISES THE UNITED STATES THAT IT DOES NOT RETALIATE AGAINST PREA GRIEVANCES, WHEN IT IS PRECISE IN ITS ORGANISATION TO DO SO.

3. FALSE CLAIM THREE:

CORE CIVIC FALISFIED REPORTS TO THE UNITED STATES ASSERTING NO “EMPLOYEE ON INMATE SEXUAL HARASSMENT” COMPLAINTS WERE MADE.

4. FALSE CLAIM FOUR:

A SECOND PREA CLAIM IN 2017 IS NOT REPORTED TO THE UNITED STATES, IS SABOTAGED AND RETALIATED AGAINST, DEMONSTRATING A PATTERN:

5. FALSE CLAIM FIVE:

CORE CIVIC ACTIVELY SABOTAGES EFFORTS FOR REDRESS RELATING TO PREA COMPLAINTS, IN CONTRAST TO ITS PROMISED POLICIES TO THE UNITED STATES.

FALSE CLAIM ACT

31 USC 3729(a)(1)(A)-(B)

1. This is a claim for treble damages and penalties under the False Claims Act, 31 USC 3739, et seq., as amended.
2. By virtue of the acts described above, Defendant(s) knowingly presented or caused to be presented, false or fraudulent and criminal claims to the United States Government, for payment or approval.
3. By virtue of the acts described above, Defendant(s) knowingly made or used, or caused to be made or used, false or fraudulent records or statements material to false or fraudulent claims for payment by the Government.
4. This Relator can at this time present evidence of false claims made by the Defendant(s) conduct, but cannot at this time identify all of the false claims for payment that were caused by the Defendants conduct.
5. The Relator cannot guarantee that practices causing the current evidence to be in hand have not been duplicated across each and every Core Civic facility which hold Immigrants. This Relator does not have access to all such records, but such evidence may exist.

6. The Government, unaware of the falsity of the records, statements and claims made or caused to be made by the Defendant(s), paid and continues to pay or causes to be paid, claims that would not be paid but for the Defendant(s) illegal conduct.
7. By reason of Defendant(s) conduct, the United States has been damaged, and continues to be damaged, in a substantial amount to be determined at trial.
8. Additionally, the United States is entitled to the maximum penalty of up to \$11,000 for each and every violation arising from Defendants unlawful conduct.

PRAYER

WHEREFORE, this qui tam Plaintiff-Relator Corey Donaldson prays for judgment against the Defendants as follows:

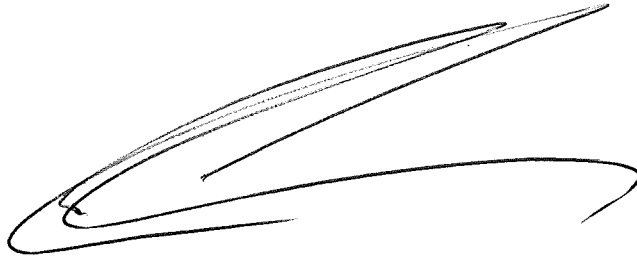
1. The Defendants cease and desist from violating 31 USC 3729.
2. That this Court enter judgement against Defendants in an amount equal to three times the amount of damages the United States has sustained because of the Defendants “industrial scale” illegal conduct against many thousands of Immigrants, therein offending the Laws of the United States, plus a civil penalty of not less than \$5,500 and not more than \$11,000 for each violation of 31 USC 3729.
3. That this Relator be awarded the maximum amount allowed pursuant to 31 USC 3730(d) of the False Claims Act.
4. That this Relator recover such other relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Pursuant to Rule 38 of the Federal Rules of Civil Procedure, this Relator hereby demands a trial by jury.

Dated November 15th 2019

Respectfully Submitted,

A handwritten signature in black ink, consisting of several fluid, overlapping strokes that form a stylized, elongated shape.

Corey Donaldson
PRO-SE Relator
Imnowunleashed@gmail.com
14 Oak Ave
Longwarry
Victoria, Australia 3816.
Phone: By arrangement via email.

CERTIFICATE OF SERVICE

Today, pursuant to Fed. R. Civ. P. 4, or Rule 4 of the Federal Rules of Civil Procedure., a copy of this Complaint was sent only to the following by Australia Post Certified Mail:

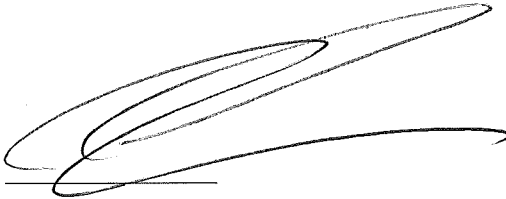
United States Attorney's Office
110 9th Avenue South, Suite A-961
Nashville, Tennessee 37203-3870

&

The Attorney General

U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

Corey Donaldson-Relator

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke at the end, positioned over a horizontal line.

DATE: Nov 15th 2019.